THOMAS M. OTAKE #7622 THOMAS M. OTAKE AAL, ALC 841 Bishop Street, Suite 2201 Honolulu, Hawai'i 96813 Telephone: (808) 523-3325

E-mail: thomas@otakelaw.com

LYNN E. PANAGAKOS #7696 841 Bishop Street, Suite 2201

Honolulu, Hawai'i 96813 Telephone: (808) 542-9943

E-mail: lynnpanagakos@yahoo.com

Attorneys for Defendant (01) MICHAEL J. MISKE, JR.

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAI'I

(01)

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL J. MISKE, JR.,

Defendant.

CR. NO. 19-00099 DKW KJM

DEFENDANT MICHAEL J. MISKE, JR.'S MOTION FOR LEAVE TO FILE DOCUMENT IN EXCESS OF WORD LIMIT; DECLARATION OF COUNSEL; CERTIFICATE OF SERVICE

DEFENDANT MICHAEL J. MISKE, JR.'S MOTION FOR LEAVE TO FILE DOCUMENT IN EXCESS OF WORD LIMIT

Defendant Michael J. Miske, Jr. ("Defendant"), by and through undersigned counsel, respectfully moves for leave to file his Memorandum in Support of his First Motion to Compel Discovery. This memorandum contains 14,510 words and is therefore in excess of the 6,250-word limit set forth in District of Hawai'i Local Rule 7.4(b).

This motion is supported by the attached Declaration of Counsel. This motion is also supported by the proposed over-sized Memorandum itself, which, concurrently herewith, is being submitted to the Court for review.

Mr. Miske respectfully submits that the attached Declaration of Counsel and the proposed Memorandum itself demonstrate good cause to exceed the word limit. Therefore, Mr. Miske respectfully requests that the Court grant him leave to file his Memorandum.

DATED: Honolulu, Hawai'i, December 20, 2021.

/ s / Lynn E. Panagakos
THOMAS M. OTAKE
LYNN E. PANAGAKOS
Attorneys for Defendant
MICHAEL J. MISKE, JR. (01)